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Attorneys for Plaintiff Jeffrey I. Golden,  
Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SANTA ANA DIVISION**

In re  
JAMIE LYNN GALLIAN,  
  
Debtor.

Case No. 8:21-bk-11710-SC  
Chapter 7

JEFFREY I. GOLDEN, Chapter 7 Trustee,  
  
Plaintiff,  
  
vs.  
  
J-SANDCASTLE CO., LLC; J-PAD LLC;  
STEVEN D. GALLIAN; BRIAN J.  
GALLIAN; JUSTIN BARCLAY; RONALD  
J. PIERPONT; ROBERT J. MCLELLAND;  
AND E. J. GALLIAN,  
  
Defendants.

Adv. No. 8:23-ap-01064-SC

**STIPULATION TO CONTINUE  
DEADLINE FOR DEFENDANTS STEVEN  
D. GALLIAN, BRIAN J. GALLIAN,  
JUSTIN BARCLAY, AND E. J. GALLIAN  
TO RESPOND TO THE COMPLAINT**

Status Conference:  
Date: September 26, 2023  
Time: 1:30 p.m.  
Place: Courtroom 5C  
411 W. Fourth Street  
Santa Ana, California 92701

Plaintiff Jeffrey I. Golden, Chapter 7 Trustee (the "Plaintiff"), for the estate of Jamie Lynn  
Gallian (the "Debtor"), and defendants Steven D. Gallian, Brian J. Gallian; Justin Barclay, and E. J.  
Gallian (the "Stipulating Defendants"), hereby request that the Court approve the within stipulation  
of the parties as follows:

**RECITALS**

A. On July 9, 2021 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code (the "Bankruptcy Code").

B. Jeffrey I. Golden was appointed and continues to serve as Chapter 7 Trustee for the bankruptcy estate.

C. On June 30, 2023, the Trustee initiated this adversary proceeding by filing his complaint (the "Complaint") against the Stipulating Defendants, J-Pad LLC, J-Sandcastle Co., LLC, Robert J. McLelland and Ronald J. Pierpont.

D. On July 3, 2023, the Clerk of the Court issued a summons on the Complaint, which set a deadline for all of the defendants to answer the Complaint by August 2, 2023.

E. The Stipulating Defendants have retained counsel in this adversary proceeding and have requested an extension of time to respond to the Complaint to permit time for the Stipulating Defendants and the Trustee to discuss a consensual resolution of the Trustee's claims against them.

F. The Trustee has agreed to extend the deadline for about 30 days to September 5, 2023, for the Stipulating Defendants to answer the Complaint.

**STIPULATION**

WHEREFORE, THE PARTIES STIPULATE AND AGREE AS FOLLOWS:

1. The above recitals are incorporated herein by this reference.

2. The deadline for the Stipulating Defendants to answer the Complaint shall be continued to September 5, 2023.

DATED: July 18, 2023

DANNING, GILL, ISRAEL & KRASNOFF, LLP

By: /s/ Aaron E. de Leest

AARON E. DE LEEST

Attorneys for Plaintiff Jeffrey I. Golden,  
Chapter 7 Trustee

1 DATED: July 18, 2023

Shulman Bastian Friedman & Bui LLP

2  
3 By:

  
Leonard M. Shulman

4 Attorney for Defendants Steven D. Gallian, Brian  
5 J. Gallian; Justin Barclay, and E. J. Gallian  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067-6006.

A true and correct copy of the foregoing document entitled (*specify*): STIPULATION TO CONTINUE DEADLINE FOR DEFENDANTS STEVEN D. GALLIAN, BRIAN J. GALLIAN, JUSTIN BARCLAY, AND E. J. GALLIAN TO RESPOND TO THE COMPLAINT will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) July 18, 2023 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

**2. SERVED BY UNITED STATES MAIL:** On July 18, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by causing to be placed a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page.

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 18, 2023

*Date*

Beverly Lew

*Printed Name*

*/s/ Beverly Lew*

*Signature*

**ADDITIONAL SERVICE INFORMATION (if needed):**

**1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)**

Aaron E. DE Leest on behalf of Plaintiff Jeffrey I. Golden  
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Robert P Goe on behalf of Interested Party The Huntington Beach Gables Homeowners Association  
kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com

Jeffrey I Golden (TR)  
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United States Trustee (SA)  
ustpreion16.sa.ecf@usdoj.gov

**2. SERVED BY U.S. MAIL**

Atty. for Defendants  
Steven D. Gallian, Brian J. Gallian;  
Justin Barclay, and E. J. Gallian  
Leonard M. Shulman, Esq.  
Shulman Bastian Friedman & Bui  
LLP  
100 Spectrum Center Dr Ste 600  
Irvine, CA 92618-4969

The Honorable Scott C. Clarkson  
U.S. Bankruptcy Court  
411 W. Fourth Street, Suite 5130  
Santa Ana, CA 92701